



# TITLE V OPERATING PERMIT

Permit No: **TV-OP-037**  
Date Issued: **September 25, 2001**

This certifies that:

**Elektrisola, Inc.**  
**126 High Street**  
**Boscawen, NH 03303**

has been granted a Title V Operating Permit for the following facility and location:

**Elektrisola, Inc.**  
**126 High Street**  
**Boscawen, NH 03303**  
**AFS Point Source Number - 3301300111**

This Title V Operating Permit is hereby issued under the terms and conditions specified in the Title V Operating Permit Application filed with the New Hampshire Department of Environmental Services on **May 29, 1996** with additional information submitted on **November 6, 2000 and December 18, 2000**, under the signature of the following responsible official certifying to the best of his knowledge that the statements and information therein are true, accurate and complete.

Responsible Official:

**George P. Downing**  
**Vice-President/Operations Manager**  
**(603) 796-2114**

Technical Contact:

**Mr. Timothy J. Day**  
**Manufacturing Manager**  
**(603) 796-2114 (ext. 332)**

This Permit is issued by the New Hampshire Department of Environmental Services, Air Resources Division pursuant to its authority under New Hampshire RSA 125-C and in accordance with the provisions of Code of the Federal Regulations 40 Part 70. This permit is effective upon issuance.

This Title V Operating Permit shall expire on **September 30, 2006**.

**SEE ATTACHED SHEETS FOR ADDITIONAL PERMIT CONDITIONS**

For the New Hampshire Department of Environmental Services, Air Resources Division

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Director, Air Resources Division

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## **ABBREVIATIONS**

AAL	Ambient Air Limit
AP-42	Compilation of Air Pollutant Emission Factors
ARD	Air Resources Division
ASTM	American Society for Testing and Materials
BTU	British Thermal Units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
COMS	Continuous Opacity Monitoring System
DER	Discrete Emission Reduction
Env-A	New Hampshire Code of Administrative Rules – Air Resources Division
ERC	Emission Reduction Credit
FR	Federal Register
HAP	Hazardous Air Pollutant
Hr	Hour
Lb/hr	Pounds per hour
mg/L	Milligrams per liter (ppm)
MMBTU	Million British Thermal Units
NAAQS	National Ambient Air Quality Standard
NHDES (or DES)	New Hampshire Department of Environmental Services
NO <sub>x</sub>	Oxides of Nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 microns diameter
ppm	part per million
ppmv	part per million by volume
ppmdv	part per million by dry volume
PSD	Prevention of Significant Deterioration
PSI	Pounds per Square Inch
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RTAP	Regulated Air Toxic Pollutant
SIP	State Implementation Plan

**ABBREVIATIONS (cont.)**

SO <sub>2</sub>	Sulfur Dioxide
TAP	Toxic Air Pollutant
TSP	Total Suspended Particulate Matter
TPY	Tons per Year
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

## Facility Specific Title V Operating Permit Conditions

### I. Facility Description of Operations:

Elektrisola (The Permittee) is a non-ferrous magnetic wire drawing/coating facility located in Boscawen, NH. Elektrisola receives copper in the form of rod, which is drawn to the proper wire diameter and annealed. This wire is then coated with enamel. The enamel may consist of an esterol, nylon, polysol, or some combination thereof. The enamel is applied to the wire via felt applicators and passed through a catalytic oven to cure the coating. The Volatile Organic Compounds (VOCs) driven off in the curing process are utilized by the internal catalytic devices to generate heat as an integral part of the manufacturing process. Greater than 96% of the VOCs generated from the use of coatings are destroyed in the ovens.

After the enamel has cured, wax is applied to the coated wire as a lubricant. All the wire-coating machines at Elektrisola are equipped with wax metering<sup>1</sup> to reduce wax usage (and VOC usage). VOC emissions primarily result from enamel solvent vapors not captured by the catalytic ovens and from the mineral spirits used as solvent for the wax. Elektrisola is a major source for Volatile Organic Compounds & Hazardous Air Pollutants and is therefore required to obtain a Title V operating permit.

### II. Permitted Activities:

In accordance with all of the applicable requirements identified in the Permit, the Permittee is authorized to operate the devices and/or processes identified in Sections III, IV, V, and VI within the terms and conditions specified in this permit.

### III. Significant Activities Identification:

#### A. Significant Activities:

The activities identified in Table 1 are subject to and regulated by this Title V Operating Permit.

Table 1 - Significant Activity Identification		
Emission Unit #	Description of Emission Unit	Emissions Unit Maximum Permitted Capacity
EU01	X-15 Coating Machines Process Line	The maximum enamel and wax usage rates identified in Table 1 of the December 2000 Temporary Permit Application are incorporated by reference into this permit.
EU02	X-25 Coating Machines Process Line	
EU03	K-124 Coating Machines Process Line	
EU04	Gemini Coating Machines Process Line	
EU05	1.5 Meter Coating Machines Process Line	
EU06	A-2 Coating Machines Process Line	

<sup>1</sup> In all coating machines, the wax application rate is approximately one thirty-sixth of the enamel on a weight basis.

Table 1 - Significant Activity Identification		
Emission Unit #	Description of Emission Unit	Emissions Unit Maximum Permitted Capacity
EU07	A-4 Coating Machines Process Line	
EU08	S-45 Coating Machines Process Line	
The total number of wire coating machines <sup>2</sup> at this facility is 151.		
EU09	134 HP Diesel Emergency Generator (Model No. D2566ME)	The maximum operating rate shall be limited to 7.3 gallons/hr of diesel fuel at a maximum of 0.4% sulfur by weight.
EU10	241 HP Diesel Emergency Generator (Model No. D2530MTE)	The maximum operating rate shall be limited to 13 gallons/hr of diesel fuel at a maximum of 0.4% sulfur by weight.

**B. Stack Criteria:**

The stacks list in Table 2 for the above listed significant devices at this facility shall meet the following criteria in accordance with the state-only modeling requirements specified in Env-A 1400:

<b>Table 2 - Stack Criteria</b>					
<b>Stack #</b>	<b>Height (ft)</b>	<b>Diameter (ft)</b>	<b>Flow rate (acfm)</b>	<b>Exit Velocity</b>	<b>Exhaust Temperature (°F)</b>
Stack 51	56.5	1.5	3593	33.9	125
Stack 54	56.5	2.00	3593	19.1	150
Stack 55	56.5	2.00	3593	19.1	220
Stack 56	56.5	2.00	3593	19.1	220
Stack 57	56.5	2.00	3593	19.1	125
Stack 58	56.5	2.00	3593	19.1	125
Stack 59	42	1.50	1744	16.5	143

Preauthorized changes to the state-only requirements<sup>3</sup> pertaining to stack parameters set forth in this permit, shall be allowed only when an air-quality impact analysis, which meets the criteria of Env-A 606 is performed either by the facility or the DES (if requested by the facility in writing) in

<sup>2</sup> The actual number of machines at this facility may differ based on changes made to this facility in accordance with Condition VIII .G.

<sup>3</sup> The term “state-only requirement” is used to refer to those requirements that are not federally enforceable but are state requirements as defined in Env-A 101.263.

accordance with the “DES Policy and Procedures for Air Quality Modeling”. All air modeling data shall be kept on file at the facility for review by the DES upon request.

**IV. Insignificant Activities Identification:**

All activities at this facility, which meet the criteria identified in New Hampshire Administrative Rules Env-A 609.03(g), shall be considered insignificant activities. Emissions from the insignificant activities shall be included in the total facility emissions for the emission-based fee calculation described in Section XXIII of this Permit.

**V. Exempt Activities Identification:**

All activities identified in Env-A 609.03(c) shall be considered exempt activities and shall not be included in the total facility emissions for the emission-based fee calculation described in Section XXIII of this permit.

**VI. Pollution Control Equipment Identification:**

Each wire-coating machine has a catalytic oven as an integral part of the machine. The catalytic ovens control VOC emissions due to enamel usage in X-15, X-25, 1.5 Meter, Gemini, K-124, A-2 and A-4 machines. VOC emissions due to wax usage in these machines are uncontrolled. In the S-45 coating machines, VOCs from both enamel and wax are captured and destroyed by the catalytic ovens. The following catalytic oven operating limitations shall be met for each coating machine type:

Table 3 - Pollution Control Equipment		
Machine Type	Coating Type	Overall VOC Removal Efficiency
X-15 (Commodity Division)	Enamel	97%
X-15 (Specialty Division)	Enamel	97%
K-124	Enamel	97%
Gemini	Enamel	99%
S-45	Enamel	97%
	Wax	81%
1.5 Meter (Commodity Division)	Enamel	96%
1.5 Meter (Specialty Division)	Enamel	96%
A-2	Enamel	97%
X-25 (Commodity Division)	Enamel	97%
X-25 (Specialty Division)	Enamel	97%
A-4	Enamel	97%

**VII. Alternative Operating Scenarios:**

No alternative operating scenarios were identified for this permit.

**VIII. Applicable Requirements:**

**A. State-only Enforceable Operational and Emission Limitations:**

The Permittee shall be subject to the state-only operational and emission limitations identified in Table 4 below.

<b>Table 4 - State-only Enforceable Operational and Emission Limitations</b>			
<b>Item #</b>	<b>Applicable Requirements</b>	<b>Applicable Emission Unit</b>	<b>Regulatory Cite</b>
1.	In accordance with Env-A 1403.01, new or modified devices or processes installed after May 8, 1998, shall be subject to the requirements of Env-A 1400.	Facility Wide	Env-A 1403.01
2.	In accordance with Env-A 1403.02(b), all existing devices or processes shall comply with Env-A 1400.	Facility Wide	Env-A 1403.02(b)
3.	In accordance with Env-A 1404.01(d), documentation for the demonstration of compliance shall be retained at the facility, and shall be made available to the DES for inspection.	Facility Wide	Env-A 1404.01(d)
4.	In accordance with Env-A 1406.01, the owner of any device or process, which emits a regulated toxic air pollutant, shall determine compliance with the ambient air limits by using one of the methods provided in Env-A 1406.02, Env-A 1406.03, or Env-A 1406.04. Upon request, the owner of any device or process, which emits a regulated toxic air pollutant, shall provide documentation of compliance with the ambient air limits to the DES.	Facility Wide	Env-A 1406.01
5.	Based on the results of modeling analysis conducted by GZA GeoEnvironmental, Inc., on December 15, 2000 and approved by DES on February 15, 2001, Elektrisola shall meet the following conditions: <ul style="list-style-type: none"> <li>a) All coatings must have a Cresols content of less than 47.1% (by weight), as applied.</li> <li>b) The maximum phenol content of coatings used in Specialty and Gemini Halls shall not exceed 40% (by weight). Further, the use of coatings with over 25% phenol shall be limited to 160 gallons/day in Gemini Hall.</li> <li>c) Coatings used in the X-25 and X-15 Halls must have an as-applied Phenol content of 25% or less.</li> <li>d) The use of coatings containing biphenyl is restricted to Gemini Hall and the maximum biphenyl content of the coatings is limited to 9% by weight. Further the use of biphenyl containing coatings is limited to 240 gallons/day.</li> </ul>	Facility Wide	Env-A 1400

**B. Federally Enforceable Operational and Emission Limitations**

The Permittee shall be subject to the Federally enforceable operational and emission limitations identified in Table 5 below:



**Table 5 – Federally Enforceable Operational and Emission Limitations**

Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Cite
1.	The Facility shall comply with the National Ambient Air Quality Standards (NAAQS) and the applicable requirements of RSA 125-C:6, RSA C:11 and Env-A 606.04. These sections include, but are not limited to, descriptions of the powers and duties of the commissioner, and requirements for adherence to permit application procedures and air pollution dispersion modeling impact analyses.	Facility Wide	RSA 125-C:6, RSA 125-C:11 & Env-A 606.04
2.	Unless otherwise specified in Env-A 2100, no person shall cause or allow visible fugitive emissions or visible stack emissions for any process, manufacturing or service-based industry to exceed an average of 20 percent opacity for any continuous 6-minute period in any 60-minute period, except where opacity is specified differently for fuel burning devices in Env-A 2003.	Facility Wide	Env-A 2107.01(a)
3.	<p><u>Calculation of Particulate Matter Emission Standards for New Process Devices</u></p> <p>Particulate matter emissions from a ‘New Device’<sup>4</sup>:</p> <p style="padding-left: 40px;">a) With a process weight rate up to 60,000 pounds per hour, shall not exceed the emission rate specified in the formula below:</p> $E = 4.10 \times P^{0.67}$ <p style="padding-left: 40px;">Or</p> <p style="padding-left: 40px;">b) With a process weight rate in excess of 60,000 pounds per hour, shall not exceed the emission rate specified in the formula below:</p> $E = 55.0 \times P^{0.11} - 40$ <p>Where:  <math>E</math> = the maximum allowable particulate matter emission rate in pounds per hour;  <math>P</math> = the process weight rate in tons per hour</p>	Facility Wide	Env-A 2103.02(c)
4.	<p><u>Volatile Organic Compounds (VOCs) Reasonably Available Control Technology (RACT) Requirements for Magnetic Wire Coating</u></p> <p>Each wire coating machine shall be limited to 1.7 lb VOC/gallon (0.2 kg/l) of coating, as applied, excluding water and exempt compounds.</p>	EU01-EU08	Env-A 1204.13
5.	Facility wide VOC emissions shall not exceed 161.4 tons/consecutive 12-month period.	Facility Wide	TP-BP-0663
6.	Hours of operation for each coating machine shall not exceed 24 hours/day and 356 days during any consecutive 365-day period.	EU01-EU08	FP-S-0010 Amended
7.	All coating machines shall be operated with wax metering.	EU01-EU08	TP-BP-0663
8.	Phenol emissions from all the S-45 coating machines combined shall be limited to 9.9 tons/ any consecutive 12-month period.	EU08	TP-BP-0663
9.	VOC emissions from all the S-45 coating machines combined shall be limited to 28.12 tons/ any consecutive 12-month period.	EU08	TP-BP-0663

<sup>4</sup> New Device - A process or device, used by a manufacturing and service-based industry installed after February 18, 1972.

<b>Table 5 – Federally Enforceable Operational and Emission Limitations</b>			
<b>Item #</b>	<b>Applicable Requirement</b>	<b>Applicable Emission Unit</b>	<b>Regulatory Cite</b>
	28.13 tons/ any consecutive 12-month period.		
10.	Visible Emission Standard for fuel burning devices installed after May 13,1970: No owner or operator shall cause or allow average opacity from fuel burning devices installed after May 13, 1970 in excess of 20 percent for any continuous 6-minute period in a 60-minute period.	EU09 & EU10	Env-A 2003.02
11.	No owner or operator shall cause or allow emissions of particulate matter from fuel burning devices installed on or after January 1, 1985 in excess of 0.30 lb/MMBTU.	EU09 & EU10	Env-A 2003.08(c)(1)
12.	The sulfur content of off-road Diesel oil shall not exceed 0.4 percent sulfur by weight.	EU09 & EU10	Env-A 1604.01(a)
13.	Each emergency generator shall be limited to 500 hours of operation per any consecutive 12-month period.	EU09 & EU10	Env-A 1211.02(i)
14.	NO <sub>x</sub> emissions from <u>all</u> the emergency generators shall be less than 25 tons during any consecutive 12-month period	EU09 & EU10	Env-A 1211.02(i)
15.	<p><u>Accidental Release Program Requirements.</u></p> <p>Storage of regulated chemicals at the facility, are less than the applicable threshold quantities established in 40 CFR 68.130. Administrative controls will be established in order to ensure that inventories of regulated substances are maintained below the specified threshold quantities. The facility is subject to the Purpose and General Duty clause of the 1990 Clean Air Act, Section 112(r)(1). General Duty includes the following responsibilities:</p> <ul style="list-style-type: none"> <li>a) Identify potential hazards which result from such releases using appropriate hazard assessment techniques;</li> <li>b) Design and maintain a safe facility;</li> <li>c) Take steps necessary to prevent releases; and</li> <li>d) Minimize the consequences of accidental releases, which do occur.</li> </ul> <p>If, in the future, the facility wishes to store quantities of high risk regulated substances above the threshold levels, an emergency response plan shall be submitted to the DES prior to storage above threshold quantities. This plan shall include the information listed in 40 CFR 68, Subpart E.</p>	Facility Wide	40 CFR 68 Federally Enforceable

### **C. Emission Reductions Trading Requirements**

The Permittee did not request emissions reductions trading in its operating permit application. At this point, DES has not included any permit terms authorizing emissions trading in this permit. All emission reduction trading, must be authorized under the applicable requirements of either Env-A 3000 (the “Emissions Reductions Credits [ERCs] Trading Program”), or Env-A 3100 (the “Discrete Emissions Reductions [DERs] Trading Program) and 42 U.S.C § 7401 et seq. (The “Act”), and must be provided for in this permit.

**D. Monitoring and Testing Requirements:**

The Permittee is subject to the monitoring and testing requirements as contained in Table 6 below:

<b>Table 6 – Monitoring/Testing Requirements</b>					
<b>Item #</b>	<b>Parameter</b>	<b>Method of Compliance</b>	<b>Frequency of Method</b>	<b>Device</b>	<b>Regulatory Cite</b>
1.	Allows for adequate dispersion of HAPs and other regulated pollutants	The Permittee shall conduct annual visual inspections of each stack and fuel-burning device. Annual inspections shall include a thorough inspection of the condition of each stack exterior and each fuel burning device, and be focused on identifying holes, leaks, deposits, deficiencies, or deterioration of equipment and stacks. Records of inspections, and subsequent maintenance, conducted as a result of the annual inspections, shall be kept on file at the facility and will be made available for review by DES and/or EPA upon request.	Annually	Facility stacks and fuel burning devices	Env-A 806.01 & 40 CFR 70.6(a)(3) Federally Enforceable
2.	Sulfur content of Diesel Oil	The operator shall conduct testing in accordance with appropriate ASTM test methods <u>or</u> retain delivery tickets which certify the weight percent of sulfur for each delivery of diesel to determine compliance with the sulfur content limitation provisions specified in this permit for liquid fuels in order to meet the reporting requirements specified in Env-A 900.	For each delivery of diesel to the facility	EU09 & EU10	Env-A 809.01 Federally Enforceable
3.	Catalyst Testing	<p>a. Elektrisola shall conduct a <u>monthly</u> catalyst testing program on all the main stacks (through which coating machines exhaust) using a flame ionization detector (FID). When the exhaust emissions, calibrated to propane, show volatile organic concentration above 35 ppmv (wet basis), Elektrisola shall test each coating machine that exhausts through that particular stack and shall replace the catalyst accordingly.</p> <p>b. In addition to the above monthly stack testing requirement, each individual coating machine shall be tested using a FID <u>at least once a year</u>. In order to meet this requirement, Elektrisola shall test up to four coating machines on each stack per month.</p> <p>c. Elektrisola shall record the following information during the monthly and annual catalyst testing:</p> <ul style="list-style-type: none"> <li>i) Temperature of the catalytic converter of each coating machine being tested.</li> <li>ii) Enamel and wax usage rates for each coating machine being tested.</li> <li>iii) Measured VOC emission concentration</li> </ul>	Monthly & Annually	EU01-EU08	40 CFR 70.6(a)(3)

**Table 6 – Monitoring/Testing Requirements**

Item #	Parameter	Method of Compliance	Frequency of Method	Device	Regulatory Cite
		in ppmv.			

**E. Recordkeeping Requirements:**

The Permittee shall be subject to the recordkeeping requirements identified in Table 7 below:

**Table 7 – Applicable Recordkeeping Requirements**

Item #	Applicable Recordkeeping Requirement	Frequency of Recordkeeping	Applicable Emission Unit	Regulatory Cite.
1.	The Permittee shall retain records of all required monitoring and testing data, recordkeeping and reporting requirements, and support information for a period of at least 5 years from the date of origination.	Retain for a minimum of 5 years	Facility Wide	40 CFR 70.6(a)(3)(ii)(B)
2.	The Permittee shall maintain records of preventative maintenance and inspection results for stacks, processes and fuel burning devices.	Maintain on a continuous basis	Facility Wide	40 CFR 70.6(a)(3)(ii)(A)
3.	The Permittee shall maintain the results of catalyst testing program conducted in accordance with item #3 of Table 6. Records of catalyst changes shall also be maintained. These records shall be made available to the DES and/or EPA upon request.	Maintain at facility at all times	EU01-EU08	40 CFR 70.6(a)(3)(ii)(A)
4.	The Permittee shall maintain annual records of actual emissions for each significant and insignificant activity for determination of emission based fees.	Maintain at facility at all times	Significant and insignificant activities	Env-A 901.04 Federally Enforceable
5.	<u>General Recordkeeping Requirements:</u> The Permittee shall maintain monthly records of total quantities of raw materials used in each process. The number of hours of operation of each process shall also be recorded.	Monthly	Facility wide	Env-A 903.02 (new rule) & TP-BP-0663
6.	<u>General VOC recordkeeping requirement:</u> The Permittee shall record and maintain the following information at the facility: <ul style="list-style-type: none"> <li>a) Identification of each VOC-emitting process or device.</li> <li>b) The operating schedule during the high ozone season for each VOC emitting process/device including: <ul style="list-style-type: none"> <li>1) Hours of operation per calendar month; and</li> <li>2) Days of operation per calendar month.</li> </ul> </li> </ul>	Monthly & Annually	Facility wide	Env-A 904.02 (new rule) & TP-BP-0663

**Table 7 – Applicable Recordkeeping Requirements**

Item #	Applicable Recordkeeping Requirement	Frequency of Recordkeeping	Applicable Emission Unit	Regulatory Cite.
	c) The following VOC emission data: 1) Actual VOC emissions from each VOC emitting process or device for: a. Each calendar year in tons; and b. A high ozone season day during that calendar year, in pounds per day. 2) The emission factors and the origin of emission factors used to calculate the VOC emissions.			
7.	<p><u>VOC Recordkeeping for Surface Coating Operations</u></p> <p>For all surface coating operations, in addition to the requirements of item #6, the following information shall be recorded and maintained:</p> <p>a) Coating formulation and analytical data, as follows:</p> <ol style="list-style-type: none"> <li>1) Supplier;</li> <li>2) Name and color;</li> <li>3) Type;</li> <li>4) Identification number;</li> <li>5) Density described as lbs/gal;</li> <li>6) Total volatile content described as weight percent;</li> <li>7) Water content described as weight percent;</li> <li>8) Exempt solvent content described as weight percent;</li> <li>9) VOC content described as weight percent;</li> <li>10) Solids content described as volume percent;</li> <li>11) Diluent name and identification number;</li> <li>12) Diluent solvent density described in lbs/gal;</li> <li>13) Diluent VOC content described as weight percent;</li> <li>14) Diluent exempt solvent content described as weight percent;</li> <li>15) Volume of diluent VOC described as gal; and</li> <li>16) Diluent/solvent ratio described as gal diluent solvent/gal coating.</li> </ol> <p>b) The number of gallons of each coating, including solvents and diluents, utilized during a typical ozone season day for each surface coating operation; and</p> <p>c) Process information for each surface coating operation for a typical high ozone season day including:</p> <ol style="list-style-type: none"> <li>1) Method of application</li> <li>2) Number of coats for coating operations</li> <li>3) Drying method, if applicable; and</li> </ol>	Maintain on a continuous basis	Facility wide	Env-A 904.03 (new rule) & TP-BP-0663

Table 7 – Applicable Recordkeeping Requirements				
Item #	Applicable Recordkeeping Requirement	Frequency of Recordkeeping	Applicable Emission Unit	Regulatory Cite.
	4) Substrate type and form.			
8.	<p><b>Monthly</b> records of fuel utilization, hours of operation and <b>twelve consecutive month rolling totals</b> of fuel utilization and hours of operation for each emergency generator shall be kept at the facility and contain the following information:</p> <ul style="list-style-type: none"> <li>a) Consumption;</li> <li>b) Fuel type;</li> <li>c) Sulfur content as percent sulfur by weight of fuel;</li> <li>d) BTU content per gallon of fuel; and</li> <li>e) Hours of operation of each emergency generator.</li> </ul>	Monthly & Annually	EU09 & EU10	Env-A 901.03 Federally Enforceable
9.	The Permittee shall calculate and maintain a 12-month rolling sum of NO <sub>x</sub> emissions from each emergency generator.	Monthly & Annually	EU09 & EU10	Env-A 901.08 Federally Enforceable
10.	The Permittee shall maintain coating consumption records in order to show compliance with item #5 of Table 4. These records shall be made available to DES personnel upon request.	Maintain at facility at all times.	Facility wide	Env-A 1400 (State only enforceable)
11.	The Permittee shall calculate and maintain a 12-month rolling sum of Phenol emissions from all the S-45 coating machines to verify compliance with item #8 of Table 5.	Monthly & Annually	EU08	TP-BP-0663 Federally Enforceable

#### F. Reporting Requirements:

The Permittee shall be subject to the reporting requirements identified in Table 8 below:

Table 8 – Applicable Reporting Requirements				
Item #	Reporting Requirements	Frequency of Reporting	Applicable Emission Unit	Regulatory Cite
1.	Any report submitted to the DES and/or EPA shall include the certification of accuracy statement outlined in Section XXI.B. of this Permit and shall be signed by the responsible official.	As specified in section XXI. B.	Facility wide	40 CFR 70.6(c)(1)
2.	<p><b>Semi-annual Permit Deviation and Monitoring Report</b></p> <p>The Permittee shall submit a summary report of monitoring data as specified in Table 6 of this permit including:</p> <ul style="list-style-type: none"> <li>a) Preventative maintenance and inspection results for stacks and emission units;</li> <li>b) Results of monthly and annual catalyst testing conducted in accordance with item #3 of Table 6.</li> <li>c) Permit deviations.</li> </ul>	Semiannually (by July 31 <sup>st</sup> and January 31 <sup>st</sup> of each calendar year)	Facility wide	40 CFR 70.6(a)(3)(iii)(A)

Table 8 – Applicable Reporting Requirements				
Item #	Reporting Requirements	Frequency of Reporting	Applicable Emission Unit	Regulatory Cite
3.	<u>NO<sub>x</sub> Reporting Requirements:</u> For fuel burning devices, the Permittee shall submit to the Director, annually (no later than April 15 <sup>th</sup> of the following year), a report of data required by items 8 & 9 of Table 7, including total annual quantities of all NO <sub>x</sub> emissions and hours of operation for the emergency generators.	Annually (no later than April 15 <sup>th</sup> of the following year)	EU09 & EU10	Env-A 901.09 Federally Enforceable
4.	<u>VOC Reporting Requirements</u> The Permittee shall submit to the Director, annually (no later than April 15 <sup>th</sup> of the following year) reports of the data required by items 6 & 7 of Table 7.	Annually (no later than April 15 <sup>th</sup> of the following year)	Facility wide	Env-A 908.03 & TP-BP-0663
5.	Prompt reporting of deviations from Permit requirements shall be conducted in accordance with Section XXVIII of this Permit.	Prompt reporting (within 24 hours of an occurrence)	Facility wide	40 CFR 70.6(a)(3)(iii)(B)
6.	Annual <u>reporting</u> and <u>payment</u> of emission based fees for pollutants, including but not limited to SO <sub>2</sub> , NO <sub>x</sub> , CO, TSP, and VOCs, shall be conducted in accordance with Section XXIII of this Permit.	Annually (no later than April 15 <sup>th</sup> & October 15 <sup>th</sup> of the following year respectively)	Facility wide	Env-A 704.03 Federally Enforceable
7.	Annual report of the actual emissions speciated by individual RTAP including a breakdown of VOC emissions by compound. This report shall also include a 12-month rolling sum of Phenol emissions from S-45 coating machines.	Annually (no later than April 15 <sup>th</sup> of the following year)	Facility wide	Env-A 907.01 (new rule) & TP-BP-0663
8.	Annual compliance certification shall be submitted in accordance with Section XXI of this Permit.	Annually (no later than April 15 <sup>th</sup> of the following year)	Facility wide	40 CFR 70.6(c)(1)

#### G. Minor Facility Amendments:

1. As provided in Facility Permit FP-S-0010 (amended on 12/31/1997), Elektrisola may make minor facility amendments (e.g. addition or removal of wire coating machines) without requiring revisions to this permit under the following conditions:
  - a. The proposed modification shall not cause the five-year contemporaneous VOC emissions increase at the facility to exceed 25 tons.
  - b. The addition of wire coating machines does not trigger a “Case-by-Case MACT Review” under Section 112(g) of the Clean Air Act (i.e., potential to emit of HAPs from the new wire coating machines is below 10 TPY for any single HAP and 25 TPY for all combined HAPs).
  - c. Elektrisola shall maintain a 5-year netting calculation following each minor facility amendment verifying compliance with Condition VIII.G.1.a.

- d. For each addition of wire coating machines, Elektrisola shall maintain a calculation verifying compliance with Condition VIII.G.1.b.
  - e. Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup of “new type” coating machines, Elektrisola shall conduct performance testing in accordance with EPA/Division approved methods.
  - f. Elektrisola shall verify compliance with items 1, 3, and 4 of Table 4.
  - g. Elektrisola shall comply with the facility-wide VOC limit of 161.4 tons per any consecutive 12-month period.
2. Elektrisola shall provide a written notification of each proposed change 15 days prior to the proposed change and such notification shall include:
- a. The date on which each proposed change will occur.
  - b. A description of each change.
  - c. Any change in emissions that will result and how this change will comply with the terms and conditions of this permit.
  - d. For each proposed minor facility amendment, Elektrisola shall submit to the Division the netting calculation as required by Condition VIII.G.1.a.
  - e. For each addition of wire coating machines, Elektrisola shall submit to the Division the calculation required by VIII.G.1.b.
  - f. Elektrisola shall submit to the Division documentation of all determinations made to verify compliance with items 1, 3, and 4 of Table 4.
3. Any minor facility amendment made pursuant to this condition that is later determined to either not qualify as a minor facility amendment or violates any applicable requirement or permit term shall be considered a violation of this permit.
4. If the potential to emit of HAPs from the new wire coating machines is greater than 10 TPY for any single HAP and 25 TPY for all combined HAPs, Elektrisola shall submit a Temporary Permit Application prior to the installation of the new machines.

**IX. Requirements Currently Not Applicable:**

Requirements not currently applicable to the facility were not identified by the Permittee.

**General Title V Operating Permit Conditions**

**X. Issuance of a Title V Operating Permit:**

This Permit is issued in accordance with the Provisions of Part Env-A 609. In accordance with 40 CFR 70.6(a)(2) this Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date five (5) years after issuance of this Permit.

Permit expiration terminates the Permittee's right to operate the Permittee's emissions units, control equipment or associated equipment covered by this permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

Pursuant to Env-A 609.02(b), this Permit shall be a state permit to operate as defined in RSA 125-C:11, III.



**XI. Title V Operating Permit Renewal Procedures:**

Pursuant to Env-A 609.06(b), an application for renewal of this Permit shall be considered timely if it is submitted to the Director at least six months prior to the designated expiration date of this Permit.

**XII. Application Shield:**

Pursuant to Env-A 609.07, if an applicant submits a timely and complete application for the issuance or renewal of a Permit, the failure to have a Permit shall not be considered a violation of this part until the Director takes final action on the application.

**XIII. Permit Shield:**

Pursuant to Env-A 609.08(a), a permit shield shall provide that:

1. For any applicable requirement or any state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically included in this Permit, compliance with the conditions of this Permit shall be deemed compliance with said applicable requirement or said state requirement as of the date of permit issuance; and
2. For any potential applicable requirement or any potential state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically identified in this Title V Operating Permit Section IX Table 8 as not applicable to the stationary source or area source, the Permittee need not comply with the specifically identified federal or state requirements.

The permit shield identified in Section XIII. of this Permit shall apply only to those conditions incorporated into this Permit in accordance with the provisions of Env-A 609.08(b). It shall not apply to certain conditions as specified in Env-A 609.08(c) that may be incorporated into this Permit following permit issuance by DES.

If a Title V Operating Permit and amendments thereto issued by the DES does not expressly include or exclude an applicable requirement or a state requirement found in the NH Rules Governing the Control of Air Pollution, that applicable requirement or state requirement shall not be covered by the permit shield and the Permittee shall comply with the provisions of said requirement to the extent that it applies to the Permittee.

If the DES determines that this Title V Operating Permit was issued based upon inaccurate or incomplete information provided by the applicant or Permittee, any permit shield provisions in said Title V Operating Permit shall be void as to the portions of said Title V Operating Permit, which are affected, directly or indirectly, by the inaccurate or incomplete information.

Pursuant to Env-A 609.08(f), nothing contained in Section XIII of this Permit shall alter or affect the ability of the DES to reopen this Permit for cause in accordance with Env-A 609.18 or to exercise its summary abatement authority.

Pursuant to Env-A 609.08(g), nothing contained in this section or in any Title V Operating Permit issued by the DES shall alter or affect the following:

1. The ability of the DES to order abatement requiring immediate compliance with applicable requirements upon finding that there is an imminent and substantial endangerment to public health, welfare, or the environment;
2. The state of New Hampshire's ability to bring an enforcement action pursuant to RSA 125-C:15, II;

3. The provisions of section 303 of the Act regarding emergency orders including the authority of the EPA Administrator under that section;
4. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
5. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;
6. The ability of the DES or the EPA Administrator to obtain information about a stationary source, area source, or device from the owner or operator pursuant to section 114 of the Act; or
7. The ability of the DES or the EPA Administrator to enter, inspect, and/or monitor a stationary source, area source, or device.

#### **XIV. Reopening for Cause**

The Director shall reopen and revise a Title V Operating Permit for cause if any of the circumstances contained in Env-A 609.18(a) exist. In all proceedings to reopen and reissue a Title V Operating Permit, the Director shall follow the provisions specified in Env-A 609.18(b) through (g).

#### **XV. Administrative Permit Amendments**

Pursuant to Env-A 612.01, the Permittee may implement the changes addressed in the request for an administrative permit amendment as defined in Part Env-A 100 immediately upon submittal of the request.

Pursuant to Env-A 612.01, the Director shall take final action on a request for an administrative permit amendment in accordance with the provisions of Env-A 612.01(b) and (c).

#### **XVI. Operational Flexibility**

Pursuant to Env-A 612.02(a), the Permittee subject to and operating under this Title V Operating Permit may make changes involving trading of emissions under this existing Title V Operating Permit at the permitted stationary source or area source without filing a Title V Operating Permit application for and obtaining an amended Title V Operating Permit, provided that all the conditions are met as specified in section XVI. A. 1. through 7. of this permit and a notice is submitted to the DES and EPA describing the intended changes. At this point, DES has not included any permit terms authorizing emissions trading in this permit.

1. The change is not a modification under any provision of title I of the Act;
2. The change does not cause emissions to exceed the emissions allowable under the Title V Operating Permit, whether expressed therein as a rate of emissions or in terms of total emissions;
3. The owner or operator has obtained any temporary permit required by Env-A 600;
4. The owner or operator has provided written notification to the director and administrator at least 15 days prior to the proposed change and such written notification includes:
  - a) The date on which each proposed change will occur;
  - b) A description of each such change;

- c) Any change in emissions that will result and how this change in emissions will comply with the terms and conditions of the permit;
  - d) A written request that the operational flexibility procedures be used; and
  - e) The signature of the responsible official, consistent with Env-A 605.04(b);
5. The Title V Operating Permit issued to the stationary source or area source already contains terms and conditions including all terms and conditions which determine compliance required under 40 CFR 70.6(a) and (c) and which allow for the trading of emissions increases and decreases at the permitted stationary source or area source solely for the purpose of complying with a federally-enforceable emissions cap that is established in the permit independent of otherwise applicable requirements;
6. The owner or operator has included in the application for the Title V Operating Permit proposed replicable procedures and proposed permit terms which ensure that the emissions trades are quantifiable and federally enforceable for changes to the Title V Operating Permit which qualify under a federally-enforceable emissions cap that is established in the Title V Operating Permit independent of the otherwise applicable requirements; and
7. The proposed change complies with Env-A 612.02 (e).

Pursuant to Env-A 612.02(c), the Permittee subject to and operating under this Title V Operating Permit may make changes not addressed or prohibited by this existing Title V Operating Permit at the permitted stationary source or area source without filing a Title V Operating Permit application, provided that all the conditions specified in Env-A 612.02(c)(1) through (6) are met and a notice is submitted to the DES and EPA describing the intended changes.

Pursuant to Env-A 612.02(d), the Permittee, Operator, Director and Administrator shall attach each notice of an off-permit change completed in accordance with Section XVI of this Title V Operating Permit to their copy of the current Title V Operating Permit.

Pursuant to Env-A 612.02(e), any change under Section XVI shall not exceed any emissions limitations established under the NH Rules Governing the Control of Air Pollution, or result in an increase in emissions, or result in new emissions, of any toxic air pollutant or hazardous air pollutant other than those listed in the existing Permit.

Pursuant to Env-A 612.02(f), the off-permit change shall not qualify for the permit shield under Env-A 609.08.

## **XVII. Minor Permit Amendments**

Pursuant to Env-A 612.04 prior to implementing a minor permit modification, the Permittee shall submit a written request to the Director in accordance with the requirements of Env-A 612.04(b).

The Director shall take final action on the minor permit amendment request in accordance with the provisions of Env-A 612.04(c) through (g).

Pursuant to Env-A 612.04(g), the permit shield specified in Env-A 609.08 shall not apply to minor permit amendments under Section XVII. of this Permit.

Pursuant to Env-A 612.04(I), the Permittee shall be subject to the provisions of Part Env-A 614 and Part Env-A 615 if the change is made prior to the filing with the Director a request for a minor permit amendment.

### **XVIII. Significant Permit Amendments**

Pursuant to Env-A 612.05, a change at the facility shall qualify as a significant permit amendment if it meets the criteria specified in Env-A 612.05(a)(1) through (7).

Prior to implementing the significant permit amendment, the Permittee shall submit a written request to the Director, which includes all the information as referenced in Env-A 612.05(b) and (c) and shall be issued an amended Title V Operating Permit from the DES. The Permittee shall be subject to the provisions of Env-A 614 and Env-A 615 if a request for a significant permit amendment is not filed with the Director and/or the change is made prior to the issuance of an amended Title V Operating Permit.

The Director shall take final action on the significant permit amendment in accordance with the Procedures specified in Env-A 612.05(d), (e) and (f).

### **XIX. Title V Operating Permit Suspension, Revocation or Nullification**

Pursuant to RSA 125-C:13, the Director may suspend or revoke any final permit issued hereunder if, following a hearing, the Director determines that:

1. The Permittee has committed a violation of any applicable statute or state requirement found in the New Hampshire Rules Governing the Control of Air Pollution, order or permit condition in force and applicable to it; or
2. That the emissions from any device to which this Permit applies, alone or in conjunction with other sources of the same pollutants, presents an immediate danger to the public health.

The Director shall nullify any Permit, if following a hearing in accordance with RSA 541-A:30, II, a finding is made that the Permit was issued in whole or in part based upon any information proven to be intentionally false or misleading.

### **XX. Inspection and Entry**

Pursuant to Env-A 614.01, EPA and DES personnel shall be granted access to the facility covered by this Permit, in accordance with RSA 125-C:6,VII for the purposes of: inspecting the proposed or permitted site; investigating a complaint; and assuring compliance with any applicable requirement or state requirement found in the NH Rules Governing the Control of Air Pollution and/or conditions of any Permit issued pursuant to Chapter Env-A 600.

### **XXI. Certifications**

#### **A. Compliance Certification Report**

In accordance with 40 CFR 70.6(c) the Responsible Official shall certify, for the previous calendar year, that the facility is in compliance with the requirements of this permit. The report shall be submitted annually, no later than April 15th of the following year. The report shall be submitted to the DES and to the U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

In accordance with 40 CFR 70.6(c)(5), the report shall describe:

1. The terms and conditions of the Permit that are the basis of the certification;

2. The current compliance status of the source with respect to the terms and conditions of this Permit, and whether the method was continuous or intermittent during the reporting period;
3. The methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
4. Any additional information required by the DES to determine the compliance status of the source.

## **B. Certification of Accuracy Statement**

All documents submitted to the DES shall contain a certification of accuracy statement by the responsible official of truth, accuracy, and completeness. Such certification shall be in accordance with the requirements of 40 CFR 70.5(d) and contain the following language:

"I am authorized to make this submission on behalf of the facility for which the submission is made. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in the enclosed documents are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

All reports submitted to DES (except those submitted as emission based fees as outlined in Section XXIII of this Permit) shall be submitted to the following address:

New Hampshire Department of Environmental Services  
Air Resources Division  
6 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095  
ATTN: Compliance Bureau

All reports submitted to EPA shall be submitted to the following address:

Office of Environmental Stewardship  
Director Air Compliance Program  
United States Environmental Protection Agency  
1 Congress Street  
Suite 1100 (SEA)  
Boston, MA 02114-2023  
ATTN: Air Compliance Clerk

## **XXII. Enforcement**

Any noncompliance with a permit condition constitutes a violation of RSA 125-C:15, and, as to the conditions in this permit which are federally enforceable, a violation of the Clean Air Act, 42 U.S.C. Section 7401 et seq., and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the DES and/or EPA. Noncompliance may also be grounds for assessment of administrative, civil or criminal penalties in accordance with RSA 125-C:15 and/or the Clean Air Act. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of RSA 125-C, the New Hampshire Rules Governing the Control of Air Pollution, or the Clean Air Act, or to obtain any other necessary authorizations from other governmental agencies, or to

comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

In accordance with 40 CFR 70.6 (a)(6)(ii) a Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

### **XXIII. Emission-Based Fee Requirements**

The Permittee shall pay an emission-based fee annually for this facility as calculated each calendar year pursuant to Env-A 704.03.

The Permittee shall determine the total actual annual emissions from the facility to be included in the emission-based multiplier specified in Env-A 704.03(a) for each calendar year in accordance with the methods specified in Env-A 620.

The Permittee shall calculate the annual emission-based fee for each calendar year in accordance with the procedures specified in Env-A 704.03 and the following equation:

$$FEE = E * DPT * CPIm * ISF$$

Where:

FEE =	The annual emission-based fee for each calendar year as specified in Env-A 704.
E =	The emission-based multiplier is based on the calculation of total annual emissions as specified in Env-A 704.02 and the provisions specified in Env-A 704.03(a).
DPT =	The dollar per ton fee the DES has specified in Env-A 704.03(b).
CPIm=	The Consumer Price Index Multiplier as calculated in Env-A 704.03(c).
ISF =	The Inventory Stabilization Factor as specified in Env-A 704.03(d).

The Permittee shall contact the DES each calendar year for the value of the Inventory Stabilization Factor and for the value of the Consumer Price Index Multiplier.

The Permittee shall submit, to the DES, payment of the emission-based fee and a summary of the calculations referenced in Sections XXIII.B., and C of this Permit for each calendar year by October 15<sup>th</sup> of the following calendar year in accordance with Env-A 704.04. The emission-based fee and summary of the calculations shall be submitted to the following address:

New Hampshire Department of Environmental Services  
Air Resources Division  
6 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095  
ATTN.: Emissions Inventory

The DES shall notify the Permittee of any under payments or over payments of the annual emission-based fee in accordance with Env-A 704.05.

### **XXIV. Duty To Provide Information**

In accordance with 40 CFR 70.6 (a)(6)(v), upon the DES's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the DES copies of records that the Permittee is required to retain by this Permit. The Permittee may make a claim of confidentiality as to any information submitted pursuant

to this condition in accordance with Part Env-A 103 at the time such information is submitted to DES. DES shall evaluate such requests in accordance with the provisions of Part Env-A 103.

#### **XXV. Property Rights**

Pursuant to 40 CFR 70.6 (a)(6)(iv), this Permit does not convey any property rights of any sort, or any exclusive privilege.

#### **XXVI. Severability Clause**

Pursuant to 40 CFR 70.6 (a)(5), the provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

#### **XXVII. Emergency Conditions**

Pursuant to 40 CFR 70.6(g), the Permittee shall be shielded from enforcement action brought for noncompliance with technology based<sup>5</sup> emission limitations specified in this Permit as a result of an emergency<sup>6</sup>. In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;
2. The permitted facility was at the time being properly operated;
3. During the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and
4. The Permittee submitted notice of the emergency to the DES within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

#### **XXVIII. Permit Deviation:**

In accordance with 40 CFR 70.6(a)(3)(iii)(B), the Permittee shall report to the DES all instances of deviations from Permit requirements, by telephone, fax, or e-mail (pdeviations@des.state.nh.us) within 24 hours of discovery of such deviation. This report shall include the deviation itself, including those attributable to upset conditions as defined in this Permit, the probable cause of such deviations, and any corrective actions or preventative

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<sup>5</sup> Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

<sup>6</sup> An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

measures taken. Within 15 days of discovery of the permit deviation, the Permittee shall submit a written report including the above information as well as the following: preventive measures taken to prevent future occurrences; date and time the permitted device returned to normal operation; specific device, process or air pollution control equipment that contributed to the permit deviation; type and quantity of excess emissions emitted to the atmosphere due to permit deviation; and an explanation of the calculation or estimation used to quantify excess emissions. Said Permit deviation shall also be submitted in writing to the DES in the semi-annual summary report of monitoring and testing requirements due July 31st and January 31st of each calendar year. Deviations are instances where any Permit condition is violated and has not already been reported as an emergency pursuant to Section XXVII of this Permit.

Reporting a Permit deviation is not an affirmative defense for action brought for noncompliance.

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September 27, 2001